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National City Bank

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	
	§	
AMY GOLDBLATT HOWARD	§	CASE NO. 09-35705
	§	
Debtor.	§	

OBJECTION TO CONFIRMATION

TO THE HONORABLE BANKRUPTCY JUDGE:

NOW COMES National City Bank secured creditor, hereinafter called Movant and makes this, its Objection to the Confirmation of Debtor's Chapter 13 Plan, and for grounds thereof would respectfully show the Court the following:

1. Movant would show the Court that on or about 12/06/2005, Debtor executed and delivered to Movant a certain Agreement in the principal amount of \$65,000.00, for a Home Equity Line of Credit as to 5783 Versailles Avenue, Frisco, TX 75034. A copy of the Agreement is attached hereto as Exhibit "A", and incorporated herein for all intents and purposes.

2. On or about August 31, 2009, Debtor filed for protection of the United States Bankruptcy Court under a Chapter 13 petition. Debtor's Chapter 13 Plan (Summary) is does not properly provided for Movant in the Plan;

3. Movant further asks the Court to order Debtor to modify the Plan to properly provide for Movant.

4. Movant asks the Court to delay confirmation of Debtor's Plan until such time as this Objection is heard and resolved.

WHEREFORE, PREMISES CONSIDERED, Movant prays the Court set this Objection for hearing and upon hearing to order modification of Debtor's Plan to reflect the changes requested. Movant further prays for such other relief to which Movant may be entitled.

Respectfully submitted,

GLAST, PHILLIPS & MURRAY, P.C.

By: /s/ Sidney H. Scheinberg
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ATTORNEYS FOR MOVANT
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above and foregoing Objection has been served on each of the following parties of interest on November 5, 2009, by either electronic notification or by placing same in the United States Mail, postage prepaid, as follows:

Debtor's Attorney
Howard Marc Spector
Howard Marc Spector
12770 Coit Road, Suite 1100
Dallas, TX 75251

Debtor
Amy Goldblatt Howard
5783 Versailles Avenue
Frisco, TX 75034

Trustee
Thomas Dwain Powers
125 E. John Carpenter Frwy
Suite 1100
Irving, TX 75062-2288

U.S. Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242-1496

/s/ Sidney H. Scheinberg
SIDNEY H. SCHEINBERG